

## **OMB 1205-0426: Supporting Statements for PRA Data Collection**

### **A. JUSTIFICATION**

This submission requests the approval for instruments used to collect follow-up data from former Job Corps program participants including graduates. The data collection instruments used for all participants, including graduates is called the Post Enrollment Data Collection (PEDC). Administration of the PEDC will occur during the second and fourth quarters after exit from the Job Corps program for all participants. The collection instruments are used to collect follow-up data about individuals who are no longer actively participating in Job Corps. These youths either graduated from Job Corps or were former enrollees who stayed in the program at least 60 days but left before completing graduation requirements.

The rationale for conducting the PEDC is explained in further detail in Section A6 (Consequences of Less Frequent Data Collection). However, this collection is necessary to comply with new performance reporting requirements of the 2014 Workforce Innovation and Opportunity Act (WIOA). This submission also requests extension of the current approval under OMB 1205-0426 until July 1, 2016 when the new reporting requirements under WIOA become fully effective.

The questions in the collection are designed to obtain:

- Data to verify the initial job or school placements of program participants and to re-verify information about placed graduates and former enrollees' employment experiences during the reporting period;
- Information about educational experiences during the reporting period;
- Summary information about the work, school, and job search activities of those who were neither working nor in school during the reporting period;
- Information about satisfaction with the services provided by Job Corps.

### **Al. Circumstances Necessitating the Data Collection**

Job Corps is the nation's largest and most comprehensive residential education and job training program for at-risk youths, ages 16 through 24. Job Corps was originally established by the Economic Opportunity Act of 1964. The program was transferred from the Office of Economic Opportunity to the Department of Labor in 1969. Job Corps was later authorized as part of the Comprehensive Employment and Training Act (1978) under Title IV-B, and this authorization continued as part of the Job Training Partnership Act (JTPA) of 1982 and the Workforce Investment Act of 1998. Beginning 7/1/2015, the program will be authorized under the Workforce Innovation and Opportunity Act (WIOA) and administered federally through the Department of Labor, Employment and Training Administration, Office of Job Corps. The Job Corps program comprises 6 regional offices and 125 Job Corps centers nationwide.

Job Corps participants are typically high school dropouts in need of further education and technical training. Most Job Corps participants live on campus, but in some centers, youths from local areas can commute to centers for training. As an open-entry, open-exit program, Job Corps

admits and graduates students throughout the year. Generally, these students are economically disadvantaged ethnic minorities who live in communities that do not foster favorable education or employment outcomes. Job Corps offers these youths academic and career technical training, social skills training, personal and career counseling, health care, and other supportive services.

During their Job Corps tenure, students can obtain their secondary school credential, learn a business or trade through the career technical training program, and participate in work-related training that is intended to make them marketable in jobs that pay a living wage. Students who obtain their high school diploma (or its equivalent) or complete their career technical training are considered to be program graduates.

Upon graduation from Job Corps, youths are prepared to pursue employment opportunities, additional educational and training experiences, or enter the Armed Forces. Career development specialists at Job Corps are responsible for assisting graduates and former enrollees (students who leave the program after 60 days without a credential and do not violate Job Corps' drug or violence policy) with finding a job or enrolling in a school or training program. Career development specialists also help students create resumes and prepare for interviews. WIOA authorizes Job Corps to provide placement services to graduates for up to 12 months after they exit the program and former enrollees for up to 3 months of placement services after exit.

WIOA mandates additional reporting requirements in Section 159 of the law which will be obtained by this collection as follows:

- the number of graduates who entered the Armed Forces;
- the number of graduates who entered apprenticeship programs;
- the number of graduates who entered unsubsidized employment related to the career and technical education and training received through the Job Corps program
- the number of graduates who entered unsubsidized employment not related to the education and training received;
- the percentage and number of graduates who enter postsecondary education;
- the average wage of graduates who enter unsubsidized employment—
  - (i) on the first day of such employment; and
  - (ii) on the day that is 6 months after such first day;

Although WIOA allows for the placement of former enrollees by Job Corps, placement services are required only for students who graduate from the program. Section 159 of WIOA requires Job Corps to report job placement information about program participants who may have obtained jobs or admission to educational programs without the assistance of Job Corps.

This data collection effort also includes re-verification of initial work and school placements of graduates and former enrollees. The effort to re-verify initial work and school placements is consistent with recommendations by the Office of the Inspector General (in *Adopting Best Practices Can Improve Placement Services to Students Terminating From the Job Corps Program* report, 1988) that the Job Corps "monitor the services provided by placement contractors to ensure that contract requirements are being met and students are receiving quality placement services."

Thus, the objectives of collecting these data are to:

- Provide yearly information to Congress and the Secretary of Labor about the employment and education outcomes of Job Corps graduates and former enrollees according to the WIOA reporting requirements;
- Assess graduates' and former enrollees' satisfaction with their Job Corps experience in order to identify aspects of the program that were useful to participants and to identify factors that contributed to decisions to withdraw from the program before graduation.

Online and telephone surveys will be conducted with graduates and former enrollees or their employers and educational institutions at specified times. The Job Corps Data Center (JCDC) will provide identifying information about graduates and former enrollees for the survey which will be used to provide contact information and identify the initial work or school placement status of graduates and former enrollees after they leave Job Corps. (Note: the revised information collection instruments, to be submitted to OMB for clearance at a later date, will be used when WIOA is implemented on 7/1/2016). The Office of Job Corps seeks continued OMB clearance to use these data collection instruments with Job Corps graduates and former enrollees until that time.

#### **A2. How, by whom and for what Purposes is the Information to be used.**

Congress and the Secretary of Labor will use the data collected with these instruments to assess the effectiveness of the Job Corps program in meeting its objectives under the Workforce Innovation and Opportunity Act. The Office of Job Corps will incorporate these data into the Outcome Measurement System to evaluate the post-center outcomes of graduates and former enrollees. The Job Corps program will use the information about student outcomes and customer feedback about satisfaction with specific services to develop or refine policies to improve the delivery of educational and job training services to at-risk youth.

#### **A3. Use of Technology to Reduce Burden**

The data collection instruments will be programmed into a computer generated online system for ongoing survey administration augmented by a Computer-Assisted Telephone Interviewing (CATI) system. This automated system performs a range of response checks and complex skip patterns, and it also checks for internal consistency. Additionally, CATI provides automated scheduling, callback, and on-line data storage, which make it easier to control the sample, monitor the study, and reduce data entry costs. Automated online interviewing reduces the burden by speeding up the collection and analysis of the results and reduces the number of interviews under CATI.

#### **A4. Efforts to Identify Duplication**

No other existing source of data can meet the specific data reporting requirements of WIOA. Although Section 116 notes that the Secretary of Labor may collect information on former Job Corps students by using quarterly wage records, such records do not include information about wage rates, hours worked, jobs held in a different state, and jobs that are not covered by

unemployment insurance (UI). In addition, UI wage records do not provide any information about enrollment in school or training programs, which is a key program outcome. All of the information referred to must be collected to meet WIOA objectives, and currently, no other significant or systematic efforts are being made by the Office of Job Corps to collect these data. The instruments presented in this application have been designed to collect this information.

#### **A5. Methods to Minimize Burden on Small Businesses**

This data collection will place minimal burden on small businesses. Businesses will only be contacted through online methods and participation in customer satisfaction surveys will be voluntary. Job Corps will follow a similar practice for individuals who are placed in a school or training program.

#### **A6. Consequences of Less Frequent Data Collection**

Since the information from former enrollees and graduates will only be obtained according to the requirements of WIOA, less frequent data collection will not be possible under the law. WIOA mandates contacts with participants during two periods; within the second and fourth quarters after exit from the program.

The PEDC contact with placed graduates and former enrollees during the two periods will collect additional information as required under the law.

#### **A7. Special Circumstances for Data Collection**

These data collection efforts do not involve any special circumstances.

#### **A8. Federal Register Notice and Consultation Outside the Agency**

Concurrent with submission of this ICR submission, ETA issued a Notice of Proposed Rulemaking that provides a 60-day period for the public to comment on the proposed change to the collection of information. In addition, the NPRM instructed that comments on the information collections in the proposed rule could be sent directly to OMB during a 30-day period.

#### **A9. Payment or Gifts to Respondents**

To meet the requirements of the Workforce Innovation and Opportunity Act, the Job Corps program utilizes the Career Development Services System (CDSS) to provide ongoing services to program graduates for up to one year after their initial placement. A key element of this system involves regular contacts between the student and his or her career transition specialist. To encourage students to maintain contact with Job Corps, the Career Information System (CIS) provides graduates with a transitional allowance and post-separation incentives: payments paid upon completion of the PEDC (\$15); after completion of the 2<sup>nd</sup> and 4<sup>th</sup> quarter follow-up surveys. Because the system for former enrollees limits placement services to 90 days, no additional incentives are offered for former enrollees to remain in contact with Job Corps.

## **A10. Confidentiality Assurances**

This survey is conducted in accordance with all relevant regulations and requirements, including the Privacy Act of 1974 (5 USC 552a), the Privacy Act Regulations (34 CFR Part 5b), the Freedom of Information Act (5 CFR 552) and its related regulations (41 CFR Part 1-1, 45 CFR Part 5b, and 40 CFR 44502).

In May 2007, in an effort to proactively support Job Corps' commitment to securing Personal Identifiable Information (PII), all aspects of the data collection process were consolidated under the secure network environment provided and maintained by the JCDC. The application is accessible via Citrix, JCDC's preferred secure method.

The JCDC takes several steps to insure the safety and integrity of the student data housed at its facilities in Austin, Texas and Limestone, Maine. All student data is housed on a central server, in a secured computer room in a locked building on the fenced and guarded facility. There are several layers of system security. First, the server network is a private network. The network is protected from the Internet by a series of layered firewalls, access control lists, and intrusion detection systems.

All Job Corps employees enter data into the system through the private network. All users must have a valid user ID and password (which is changed every 90 days) to enter the system. Additional security is obtained through the use of application level user IDs and passwords and specific permission applied at the database level. The integrity of the data is insured by running daily validation programs that submit the data to a set of pre-approved business rules established by the Office of Job Corps. In order to secure the integrity of the data during transmission to the data collection contractors, the JCDC has established 128 bit encrypted Citrix sessions from the data collection center operators to the JCDC. All of IMPAQ and Battelle survey staff have completed security awareness training and have access to Citrix environment and the CDSS suite of applications.

Additionally, the contractor survey sites are maintained in accordance with the Guide for Developing Security Plans for Information Technology Systems (NIST Special Pub 800-18) posted by The National Institute of Standards and Technology's Computer Security Resource Center. Internal access to individual records within the database and the ability to access data transmissions between the Job Corps Data Center and the data collection contractor are controlled by all appropriate security measures, including controlled user names, passwords, profile name, host name, firewall security IDs, and crypto cards. Transfer of data occurs only via Citrix, ensuring a secure means of communication for the data collection contractors and JCDC.

Additionally, the personal computers (PCs) in staff offices that are wired to the network are located within the same building as the network drive. The PCs are accessible only after providing individual user passwords that must be changed on a regular basis. Screensavers are installed on all PCs, set to activate after ten minutes, and can only be released through the individual user's password. PC passwords are not physically documented; therefore, loss of

access may be recouped only by the reassignment of a password by the information systems staff.

All respondents are told that completing the interview is voluntary and that the information they provide will not be shared with anyone outside of the Job Corps community. Answers to some questions in the instrument will be provided to appropriate agency staff (for example, information that results in questioning the validity of the initial placement will be reported to Job Corps Regional Office staff for follow-up), and answers to other questions will be reported at the individual level in the Job Corps Outcome Measurement System (for example, placement and wage status during the second and fourth quarters after exit). Therefore, it is not possible to guarantee to respondents that their answers will not be released to anyone. However, respondents will be assured that Job Corps will use the collected data only for program evaluation purposes and that their answers will not be shared with anyone outside of Job Corps without their written approval.

The policies and procedures maintained at any facility operated by service providers under contract are designed to protect the confidentiality of data. All contract staff sign pledges to protect respondents' confidentiality. Additionally, the issues of confidentiality will be addressed in training sessions for all staff involved with the administration of the data collection instruments. Access to sample selection data will be limited to those who have direct responsibility for sample selection. Individual identifying information will be maintained separately from hardcopy collection forms and from computerized data files prepared for conducting the analysis.

To keep the data private, it is important not to release data into public use files or to present results in reports so that individuals can be identified. Data collected through the instruments presented here will not be made publicly available. Job Corps staff or contractors will analyze data for purposes of program management and quality improvement. Nonetheless, reports that use these data will be handled in a manner that eliminates the possibility of compromising confidentiality. Job Corps staff and contractors will follow commonly accepted guidelines (what the Federal Committee on Statistical Methodology calls the Threshold Rule) and display only aggregated data when there are more than three cases in a cell table. When there are three or fewer cases in a cell table, tabular data will be presented by combining categories or suppressing cells to ensure the elimination of possible individual identities. Given the size of Job Corps centers and the monthly year-to-date aggregation of data, the data presented in any cell table will most likely represent information from at least four observations.

#### **A11. Additional Justification for Sensitive Questions**

These data collection instruments submitted for approvals do not include questions of a sensitive or personal nature. All respondents are assured that their responses will be kept private at the outset of the survey or phone interview unless they wish to specifically authorize its release in writing. In addition, they will be informed that they do not have to answer questions with which they are uncomfortable.

All of the questions concerning wages and income have been successfully pretested, and similar

questions have been used extensively in previous instruments with no evidence of adverse consequences. Additionally, the survey instrument is equipped to accommodate respondents who are uncomfortable providing a specific wage by allowing their answers to be coded in ranges. Specifically, similar questions about wages and income from employment were used in the "Evaluation of the Impact of the Job Corps Program on Participants' Post-Program Labor Market and Related Behavior" study (CMB 1205-0351, expiration date 10/96).

**A12. Estimates of the Burden of Data Collection**

This data collection is an annual process that supports the administration of approximately 88,060 Job Corps online surveys and telephone interviews. The surveys will require an average of 12 minutes to complete and the telephone interviews 15 minutes. These administration times are based on past experience in using these instruments.

The combined reporting burden for respondents associated with this data collection effort is approximately 18,500 hours, as shown in Table 1.

**Table1: Estimates of Respondent Burden Average Time**

<b>Respondent Category</b>	<b>Number Of Respondents</b>	<b>(hours) per Respondent</b>	<b>Estimated Hours</b>
Online survey of Former Enrollees and Graduates during the second and fourth quarter after exit	57,239	0.20	11,639
Telephone interview of Former Enrollees and Graduates during the second and fourth quarter after exit	16,731	0.24	4,043
Employer/Institution Customer Satisfaction	<u>14,090</u>	<u>0.25</u>	<u>3,471</u>
Total	88,060		19,153

Costs to respondents are limited to the time they will spend answering the online survey and being interviewed by telephone.

Table 2 shows the estimated costs to respondents, based on hourly rate data from follow up surveys conducted in 2014. These hourly rates are the mean wages reported by survey respondents in each category. A standard hourly rate of \$25.00 per hour is used for estimating the costs of responses for employers and educational institutions.

The total estimated cost of the burden for respondents is approximately \$ 240,480 per year. This burden is offset by the incentive payments totaling approximately \$ 864,148 (See section A14 for calculation) that will be provided to many of the respondents for remaining in contact with the follow-up system for services and tracking.

**Table 2: Estimated Cost to Respondents**

**Estimated Data Total Estimated Data Collection**

Respondent Category	Collection Number of Respondents	Number of Hours	Hourly Rate	Collection Cost to Respondents
Online survey of Former Enrollees during the second and fourth quarter after exit	12,660	2,575	\$9.63	\$24,797
Online survey of Graduates during the second and fourth quarters after exit	44,579	9,064	\$9.85	\$89,280
Telephone interview of Former Enrollees during the second and fourth quarter after exit	3,700	894	\$9.63	\$8,609
Telephone interview of Graduates during the second and fourth quarter after exit	13,031	3,149	\$9.85	\$31,018
Employer/Institution customer satisfaction survey	<u>14,090</u>	<u>3,471</u>	\$25.00	<u>\$86,785</u>



### **A13. Estimated Cost of the Survey**

There are no costs to the respondents for participating in this survey. All telephone or postage costs for contacting the respondents are borne by the federal government through the data collection contractors.

### **A14. Estimates of Annual Costs to the Federal Government**

The estimated cost of funding this data collection effort in 2014 was \$3,500,000 dollars. This estimate includes the ongoing maintenance of the infrastructure needed to administer the CATI system, ongoing data communication to and from the Job Corps Data Center, data collection using online surveys and telephone interviews from trained staff who are not Job Corps employees, data processing including coding of occupational and industry information, and preparation of summary data tabulations. Supervision of this total system is also included here. This cost does not include onetime expenditures that will not recur in the future.

The estimated cost of funding this data collection effort as revised by the increased reporting requirements of WIOA will remain at \$3,500,000 since the savings from the addition of the online survey collection as the primary instrument is projected to offset the increased burden.

Approximately 40% of the cost is budgeted for labor. Approximately 5% of the cost is budgeted for long distance phone service, and approximately 55% of the cost is budgeted for software and equipment including the CATI facilities.

Additionally, the incentive system used to help ensure that graduates remain in contact with the Job Corps system will cost approximately \$ 864,148 annually (Table 3). The incentive system allots \$15 payments to graduates for each survey completed. The payments correspond to the second and fourth quarter collection periods.

**Table 3: Incentive Payments**

Graduate Surveys	Respondents	Incentive	Amount
Placed graduates at second and fourth quarters after exit	57,610	\$15	\$ 864,148

Altogether, the total cost per completed interview for this data collection is estimated at approximately \$ 59.00 for the Job Corps Post Enrollment Data Collection System.

### **A15. Changes in Burden**

. WIOA authorizes Job Corps to provide placement services to graduates for up to 12 months after they exit the program and former enrollees for up to 3 months of placement services after exit.

WIOA mandates additional reporting requirements in Section 159 of the law which will be obtained by this collection as follows:

- the number of graduates who entered the Armed Forces;
- the number of graduates who entered apprenticeship programs;
- the number of graduates who entered unsubsidized employment related to the career and technical education and training received through the Job Corps program
- the number of graduates who entered unsubsidized employment not related to the education and training received;
- the percentage and number of graduates who enter postsecondary education;
- the average wage of graduates who enter unsubsidized employment—
  - (i) on the first day of such employment; and
  - (ii) on the day that is 6 months after such first day;

Although WIOA allows for the placement of former enrollees by Job Corps, placement services are required only for students who graduate from the program. Section 159 of WIOA requires Job Corps to report job placement information about program participants who may have obtained jobs or admission to educational programs without the assistance of Job Corps.

The estimated added burdens due to these requirements are 34,737 additional respondents, 34,737 additional responses, and 7,713 additional hours.

#### **A16. Tabulation and Publication Plans and Time Schedules for the Project**

The data collected serves three primary purposes. First, the data is used to fulfill part of the performance measurement and reporting requirements for the Job Corps program specified in WIOA. Second, data is used for independent verification of contractor reported outcomes regarding placement and wages. Such information is used in determining incentive and award fees as part of the performance-based service contracts through which Job Corps operates centers and post-center services. Finally, the information supports the continuous program improvement activities regularly conducted by the Office of Job Corps and program operators. Although the same data collection instruments support all the purposes, the analysis plan, reporting plan and time schedule for each does differ.

Performance measurement results are calculated and published on a monthly basis at the center, regional, and national levels. These reports include the following measures:

- the proportion of initially placed graduates and former enrollees who are still placed in a job or schooling program during the second and fourth quarters after exit; and
- the average weekly earnings of placed graduates and former enrollees.

As part of each contractor's performance measurement, data from the surveys of former enrollees and graduates who were identified as placed in a job or school program are used by the Office of Job Corps to verify the reports provided by those contractors. Reports of questionable placements (QPs), i.e., those that fail to meet Job Corps' criteria for hours employed or enrolled in school and/or minimum wages, are produced either from the survey

data or from employer/school verification mechanisms. QP reports are provided to the Job Corps Regional Offices for follow up with the reporting contractor to determine whether the reported placement will be disallowed for the performance report for that contractor. These QP reports are for internal contractor monitoring and management purposes only and are not published or made public.

**A17. Approval Not to Display OMB Expiration Date**

The instruments will be administered as computer-assisted online and telephone interviews. OMB expirations dates will be displayed on the survey screens for the online survey however no hardcopy instruments will contain the printed expiration date for telephone interviews. However, in conducting follow-up activities with employers and schools it is anticipated that respondents will sometimes prefer to complete a hardcopy version of the instrument rather than an online survey or telephone interview. In such cases, the questionnaire, including the OMB control number and expiration date, is mailed or sent via facsimile to the contact at the employing organization or school for completion.

**A18. Exceptions to Certificate**

No exceptions are requested.